

2 UNIVERSITY PLAZA, SUITE 402, HACKENSACK, NJ 07601
T. 201.265.6400 F. 201.265.0303

1441 BROADWAY, SUITE 6022, NEW YORK, NY 10018
T. 212.354.0111

April 18, 2019

VIA ECF

Douglas C. Palmer
Clerk of Court
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *Bowman, et al. v. Société Générale de Banque au Liban SAL, et al.*,
19-cv-02096 (DLI)(SJB)**

Dear Mr. Palmer:

We represent Plaintiffs in the above-referenced action and respectfully submit this application pursuant to Guidelines 50.3.1(a) and (d) for the Division of Business Among District Judges, Eastern District of New York, for a determination that this matter is related to *Bartlett, et al. v. Société Générale de Banque au Liban SAL, et al.*, 19-cv-00007 (CBA)(VMS) (in which we also represent the plaintiffs), currently pending before the Hon. Carol Bagley Amon. We also respectfully request reassignment of the *Bowman* case to Judge Amon pursuant to Guideline 50.3.1(e). Defendants do not object to our requests herein.

Under Guideline 50.3.1(a), “[a] civil case is ‘related’ to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge.” The *Bowman* and *Bartlett* cases are substantively identical—*Bowman* simply represents additional plaintiffs alleging the same conduct against the same Defendants.

In both cases, victims or the family members of victims of terrorist attacks perpetrated in Iraq sued 11 banks¹ under the Anti-Terrorism Act, 18 U.S.C. §§ 2331 *et seq.* (“ATA”). The plaintiffs in both cases allege that Defendants knowingly provided material support to and aided and abetted the terrorist organizations that committed the attacks in which they or their family

¹ The Defendants in this case and in *Bartlett* are: Société Générale de Banque au Liban SAL, Fransabank SAL, Middle East Africa Bank, Blom Bank SAL, Byblos Bank SAL, Bank Audi SAL, Bank of Beirut SAL, Lebanon Gulf Bank SAL, Banque Libano-Francaise SAL, Bank of Beirut and the Arab Countries and Jammal Trust Bank SAL (“Defendants”).

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members were injured, giving rise to civil liability under 18 U.S.C. § 2333(a) and (d). The claims in *Bartlett* and *Bowman* are against the *same* defendants, for the *same* conduct, brought under the *same* statute and will implicate the *same* discovery issues. Except for the *Bowman* Plaintiffs' particularized damages, the "facts and legal issues" are *identical* between the two actions, and both "arise from the same transactions or events." Guideline 50.3.1(a). In sum, the *Bowman* case is purely an extension of the *Bartlett* case pending before Judge Amon.

The *Bowman* Plaintiffs filed their complaint on April 10, 2019 and thereafter contacted counsel representing the Defendants in the *Bartlett* case to determine whether they would accept service of process for the *Bowman* action on Defendants' behalf. Counsel for Defendants agreed to waive objections to service of process in *Bowman* on condition that the parties enter into the same type of stipulation that they entered into in *Bartlett*, putting the two cases on the same schedule with the Court. Plaintiffs accepted Defendants' offer. Pursuant to Guideline 50.3.1(d), Plaintiffs then conferred with Defendants as to Plaintiffs' request herein for reassignment of *Bowman* to Judge Amon, and Defendants stated that they do not object to it.

Accordingly, for the reasons set out above, Plaintiffs respectfully request a determination that the *Bowman* case is related to the *Bartlett* case pursuant to Guidelines 50.3.1(a) and 50.3.1(d) and its reassignment to Judge Amon pursuant to Guideline 50.3.1(e).

Respectfully submitted,

/s/ Gary M. Osen

Gary M. Osen

cc: All Counsel